



**Before the  
DEPARTMENT OF TRANSPORTATION  
OFFICE OF THE SECRETARY OF TRANSPORTATION  
Washington, D.C. 20590**

In the Matter of	)	
	)	
Transparency of Airline Ancillary Fees	)	Docket No. DOT-OST-2014-0056
And Other Consumer Protection Issues	)	

**COMMENTS OF  
BUSINESS TRAVEL COALITION**

September 29, 2014

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## **I. INTRODUCTION**

Business Travel Coalition (BTC) welcomes the opportunity to comment on this U.S. Department of Transportation (DOT) Notice of Proposed Rulemaking (NPRM). BTC further appreciates the accomplishments of DOT in the area of protecting air travel consumers against unfair and deceptive airline practices, particularly with respect to full-price advertising and disclosure of airline ancillary fees (e.g., checked baggage). DOT's role and responsibility to police airlines' anti-consumer policies and practices has become orders of magnitude more important in recent years. This NPRM is best analyzed against a new airline industry backdrop.

## **II. A RADICALLY CHANGED AIRLINE INDUSTRY**

As the U.S. airline industry has consolidated to just 3 mega network carriers, those airlines have to worry far less about customers' needs and concerns. Airlines know that the customer has dramatically fewer airline choices than in past years. Importantly, because of the federal preemption doctrine in the Airline Deregulation Act of 1978, consumers have no private right of action at the state or federal levels if harmed by airlines. Furthermore, state consumer protection statutes do not apply to airline passengers and the Federal Trade Commission has no authority in this industry.

Price transparency is vitally important for the competitive process to function properly. However, airline industry consolidation has been accompanied by carriers aggressively unbundling their products charging fees for services previously included and paid for by consumers in the price of their tickets. While unbundling is

generally pro-competitive, it is unlikely to be beneficial without transparency in prices that is typically intended to accompany it. Indeed, airlines have been increasingly able – without competitive repercussions – to ignore the demand for ancillary fee data even from their largest, most sophisticated corporate, university and government customers. Moreover, airlines have inadequately responded to the concerns of Congress and DOT over lack of transparency and transactability of ancillary fees.

In eschewing true price transparency, airlines increasingly mask the all-in price of air travel, with two major adverse effects. First, lack of price transparency prevents consumers from efficient comparison-shopping of air travel offerings across multiple airlines – a hallmark of U.S. airline industry deregulation. A second consequence of the deterioration in price disclosure is that ancillary fees go largely undisciplined by market forces. Likewise, base fares are today not exposed to the full discipline of the marketplace and represent unreliable comparative benchmarks for consumers and regulators alike because some fares contain specific services that others do not. Arguably, to the extent that airlines are in a commodity business, it is to their advantage to attempt to differentiate themselves by making meaningful price comparisons difficult.

As airlines have grown larger and more powerful relative to consumers through consolidation, they have increasingly been able to refuse to provide consumers with ancillary services and associated fee information. This supports the notion that rivalry creates incentives for sellers to fully inform consumers about the pricing,

quality and availability of their products. Conversely, the loss of competition through airline industry consolidation has diminished those incentives. With fewer players in the market, the need for sellers to reach agreement on matters such as how to deal with baggage fees is minimized because it can be handled by the airlines “tacitly.”

The most pernicious effects of such radical consolidation may not be the most easily observable ones, e.g., higher prices. Airlines seem emboldened to reduce transparency, undermine DOT’s consumer-protection and Open Skies authorities and erect a fence around the U.S. to frustrate new entry by foreign carriers.

Indeed, airlines’ newfound monopsony power is being projected not in the traditional practice against supply chain participants, but rather against DOT, their regulator.

**Examples include:**

1 - drafting H.R. 4156, the Transparent Airfares Act of 2014, to reduce fare transparency and undermine DOT’s consumer protection authority;

2 - blocking Norwegian Airlines International’s application to provide new low-cost services to the U.S. by seeking to intimidate DOT and seeking Congressional intervention to block foreign carrier new entry;

3 - frustrating Middle Eastern carriers by restricting efficient access to U.S. markets;

4 - fighting to eliminate the Ex-Im Bank to keep modern new Boeing planes out of the fleets of foreign carriers that would introduce new services to the U.S.; and

5 – endeavoring, it would appear, to intimidate DOT in an August 2014 meeting comprising some fourteen airline lawyers concerning this very rulemaking.

Consumers need strong protections more than ever so long as all such protections are consolidated at the DOT, unlike all other industries where consumers can sue companies for damages or State Attorneys General can intervene on behalf of their citizens.

### **III. NOW IS THE TIME TO ISSUE THE ANCILLARY FEE RULE**

DOT issued the first of recent airline passenger protection rules in December 2009 and a second one in April 2011. On May 21, 2014 DOT published a new NPRM regarding consumer protections. BTC has analyzed that NPRM and has concluded that the long awaited rule on the transparency / transactability of ancillary fees, which is one of many proposals within the NPRM, is at significant risk of being delayed deep into 2015, or even halted indefinitely.

The reason for concern is that on balance the numerous other proposals in the NPRM are fraught with inconsistencies and contradictions and have not been vetted very well, it would appear. DOT is likely to receive an avalanche of comments, analyses and studies during this NPRM process that will take it considerable time to work through if it wants to get the proposals right. Moreover, DOT needs to ensure

that the package as a whole is coherent bearing in mind that the agency knows airlines will most likely take them to court once the rule is published as they did with the April 2011 consumer protection rule.

As such, BTC and consumer groups are encouraging DOT to move forward promptly with the ancillary fee rule and to take the time necessary to consider the newly raised and unvetted possible rules on other topics (**see Addendum I**). DOT has indeed proceeded that way in the past. The ancillary fee issue was included in the April 2011 rulemaking. However, DOT ultimately decided it needed more time and analysis and, as such, chose to include the fees issue in the current rulemaking process ensuring that it was exhaustively analyzed.

Consumers lost the ability to comparison-shop the total price of air travel options since airlines began aggressively unbundling their products in 2008. DOT and the Office of Management and Budget have examined the ancillary fees issue with all manner of industry and consumer group input for more than 1,000 days. Travel industry participants want true comparison-shopping for consumers restored as soon as possible.

A recently concluded BTC survey of 343 corporate, university and government travel managers, travel management company executives and other industry professionals found that:

- 331, or 96.5 percent of survey participants think airlines should proactively provide ancillary fee information to channels where they sell their base fares;
- 325, or 94.75 percent of participants believe that because the marketplace after 6 years has not fixed this problem, DOT should issue a rule requiring airlines to provide this information to channels where they sell their base fares; and
- 304, or 90.48 percent believe DOT should require ancillary fee information to be shared by airlines in a format that allows the purchase of such services in the same transaction as the ticket purchase (**see Addendum II**).

The DOT proposal within the NPRM on ancillary services and associated fees is thoughtfully presented. However, there are significant gaps in the proposal that could leave consumers at risk of continued unfair and deceptive practices by airlines in pricing, marketing and selling those services. Following is analysis and recommended changes in response to DOT's ancillary fee proposal.

#### **IV. CHANGES TO PROPOSED ANCILLARY FEE RULE**

Consumers should be able to see, compare and purchase basic ancillary services through all of the distribution channels that airlines have opted to use. We thus favor the critically important DOT proposal that an airline be required to provide ancillary fee data to ticket agents who are authorized to sell travel services on behalf of an airline.

However, that core proposal needs to be accompanied by certain other elements in order to fully serve the interests of airline consumers. The three most critical elements that need to be incorporated into any final rule are outlined below.

**Three Critical Changes to Proposed Rule:**

- 1) The rule should include a requirement that fee data provided to ticket agents be transactable.**

**Rationale:** To airline consumers, transparency and transactability are interlocked, and consumers should be able to buy basic ancillary services during the ticket purchase process. A rule that does not require airlines to enable consumers to purchase basic ancillary services (i.e., transactability) would not resolve the problems that confront airline consumers (**see Addendum III**).

Without transactability, prices for ancillary services would change and specific seats, for example, might no longer be available when a customer attempts to purchase them, undermining the principle of transparency.

Airlines now change prices for ancillary services like seat assignments on a dynamic - potentially minute-by-minute - basis, so that a price presented to a traveler or travel agent during the search process may not be the same price later charged for that service, unless the ancillary service can be purchased along with the ticket.



As a result, there is a strong potential for bait-and-switch pricing when travelers are offered low prices during the search process, then charged higher ones when they try to complete the transaction, particularly after a traveler has been locked into a non-refundable ticket. In addition, desired seats, such as four adjoining seats for a family, may have disappeared when a consumer tries to buy them later.

Without transactability, ancillary service bookings would be more confusing, time consuming, complicated and counterintuitive as consumers or their agents are forced to take multiple additional steps to purchase a core component of their flight, only to see prices rise or inventory disappear when they attempt to do so.

**Solution:** The rule should require airlines to make all of the basic ancillary services that they offer transactable at the time of ticket purchase through the distribution channels they choose to use. Some airlines already make a limited portion of their ancillary services transactable today through ticket agents, so there is no technical limitation preventing it. Ancillary fees are transacted smoothly and efficiently through existing industry protocols and technical standards.

**2) The rule should require airlines to share information on ancillary services with all ticket agents they have opted to use, including GDSs (i.e. “Option A”).**

**Rationale:** Requiring disclosure of ancillary service fees to ticket agents that sell directly to consumers but not global distribution systems (GDS) (i.e. “Option B” in the NPRM) is not a viable option. There is no usable, workable mechanism by which airlines can electronically disseminate their ancillary service information to tens of thousands of individual travel agents other than the GDS networks, and most travel agents depend on the GDSs for nearly all of their pricing information.

GDSs have had the proven and tested capability to receive and efficiently disseminate this information to travel agencies since late 2010. The rule should utilize that capability to ensure that ancillary fee information can be disseminated through all of the channels that airlines and consumers use.

**Solution:** The rule should combine Option A with transactability to ensure that travelers are able to see, compare and purchase the ancillary services they need through any available distribution channel in which the airline offers its services.

**3) The rule should include boarding and change/cancel fees as basic ancillary services, as well as any ancillary bundles offered, not just checked and carry-on baggage and paid-for seat reservations.**

**Rationale:** Airlines made the strategic business decision to break apart the base ticket price into its component parts, including boarding, seating and baggage, thus depriving consumers of the ability to readily compare all-in pricing. This rule

should address that consumer harm by making all of the original components of the ticket price subject to the rule. As baggage and seat fees are already covered in the proposed rule, any fees for boarding also should be covered.

Change/cancel fees are already transparent – and generally transactable – and this rule should codify that protection. Ancillary bundles (that is, combining two or more basic services with or without other services not covered by the DOT rule, for example, Wi-Fi services bundled with a seat) should also be covered, or those bundles may be used as a way to avoid the requirements of the rule.

**Solution:** The proposed rule should be expanded to include fees for boarding and change/cancel fees as “basic ancillary services” under the disclosure and transactability requirements. The rule should also require that airlines must treat ancillary bundles as “basic ancillary services” covered by the rule if they include any of the covered ancillary services.

## **V. CONCLUSION**

We appreciate the opportunity to comment on this important rulemaking. The consumer has waited some 6 years to have true comparison-shopping restored. Every day that goes by consumers are financially harmed by misleading practices and supra high fees for ancillary services as those fees go undisciplined by the marketplace. We urge DOT to deal with the ancillary fee rule right away and not permit this, the most important part of the rulemaking, to be

delayed by the long period of time likely to be required to analyze the great number of other complex and controversial proposals within the NPRM.

Respectfully Submitted,  
Kevin P. Mitchell  
Chairman and Founder  
Business Travel Coalition

## Addendum I

September 11, 2014

The Honorable Anthony Foxx  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

Regarding DOT-OST-2014-0056-0079

Dear Secretary Foxx,

We consumer groups are writing to you to urge the Department to focus on what we consider the core issue in the current airline consumer protections NPRM - the consumer's ability to see, compare and buy ancillary fees. Consumers do not want to see this issue delayed again should other portions of the complicated NPRM require more study and analysis.

A robust docket shows that American consumers need and demand price transparency, the ability to comparison shop increasingly complex airline tickets along with fees for ancillary services and the ability to purchase those services wherever airlines choose to sell their tickets.

The solution is simple. The DOT's final rule should ensure that:

- Airline consumers can see the full cost of flying including basic ancillary fees.
- Airline consumers are able to comparison shop across airlines including passenger and flight specific ancillary fees.
- Airline consumers are able to purchase these ancillary products at the same time that they pay for their airfares.

The free market works only when prices are transparent, and consumers have waited long enough. As you know, the debate on this issue has been exhaustive.

- More than three years of industry studies, government analyses and economic papers.
- Detailed congressional hearings and meetings of the DOT Advisory Committee for Aviation Consumer Protection.
- Newspaper editorials.

- Hundreds of pages of rulemaking comments.
- Tens of thousands of consumer signatures.
- An extraordinary year-long review by the Office of Management and Budget.

We urge DOT to move expeditiously to ensure that ancillary fees are disclosed, searchable and transactable. Consumers have already waited more than three years for this issue to be addressed; we cannot risk further delay.

Over recent years airlines have made their ancillary fees increasingly complex. Some airlines are even moving to dynamic, real-time pricing for things like carry-on and checked-baggage fees and seat reservations fees. Those airline actions to shroud ancillary fees during the purchasing process have made the buying process unfair and deceptive for consumers attempting to purchase the services they will need on their flights.

Our organizations are thrilled that DOT has finally, after more than a thousand days, published this rulemaking. Now, we urge the Department to complete its rulemaking with robust requirements for the disclosure and transactability of ancillary fees.

Given the complexity of this rulemaking, consumer groups will understand should DOT require additional time to reflect on the new and important issues that have been added to this rulemaking such as a new definition of what constitutes a travel agent, expanding the pool of airlines reporting operation statistics, customer service plans from ticket agents, transparency of codeshare operations, disclosures of marketed carriers by online travel agencies and screen bias displays. If so, the DOT could follow its precedent with ancillary fees in the last consumer protection rule and request additional comments on any or all of those topics.

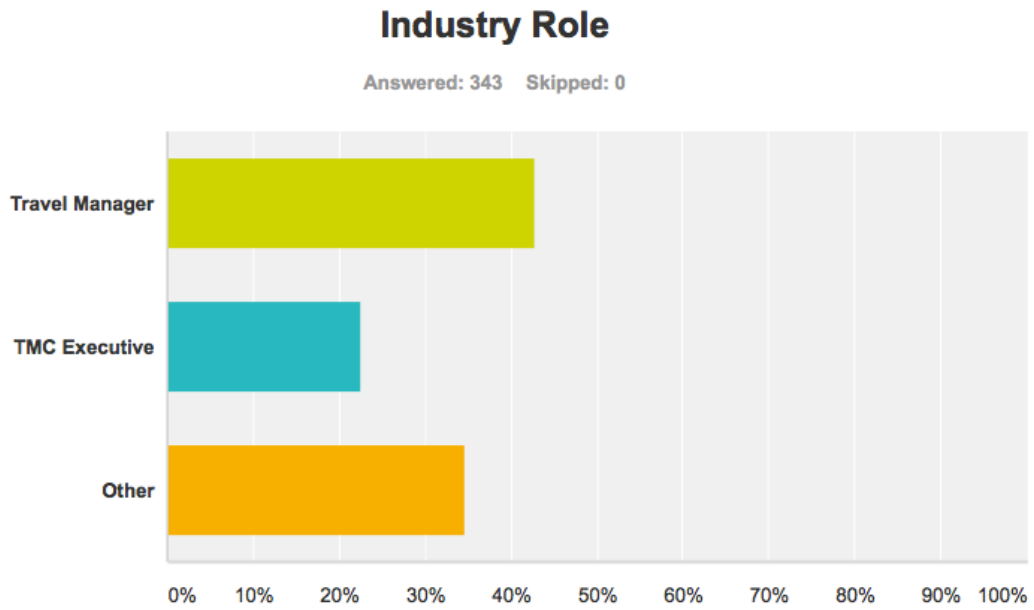
We urge you not to allow the complexity and scope of this NPRM delay the relief consumers have so desperately needed for the last six years since airlines begun aggressively unbundling their products. Consumers have waited long enough to know the full cost of airline travel.

Sincerely,

Consumer Federation of America  
National Consumers League  
Consumer Watchdog  
Travelers United  
Association for Airline Passenger Rights  
Airline Passengers.org  
Business Travel Coalition  
PlusInc  
Ed Perkins, Retired Founding Editor, Consumer Reports Travel Letter

## Addendum II

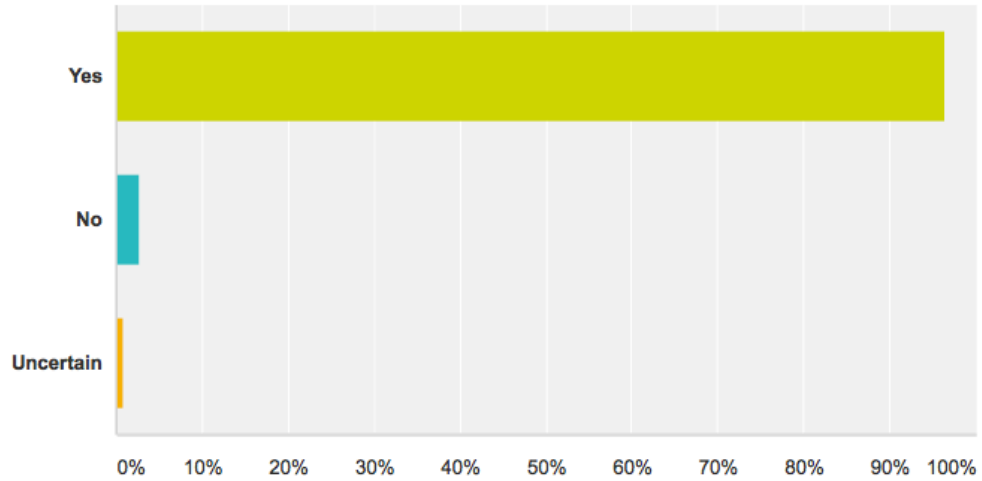
### Travel Industry Survey Regarding Ancillary Fees Closed September 22, 2014



Answer Choices	Responses
▼ Travel Manager	42.86% 147
▼ TMC Executive	22.45% 77
▼ Other	34.69% 119
Total	343

## Do you think airlines should proactively provide ancillary fee information to channels where they sell their base fares?

Answered: 343 Skipped: 0

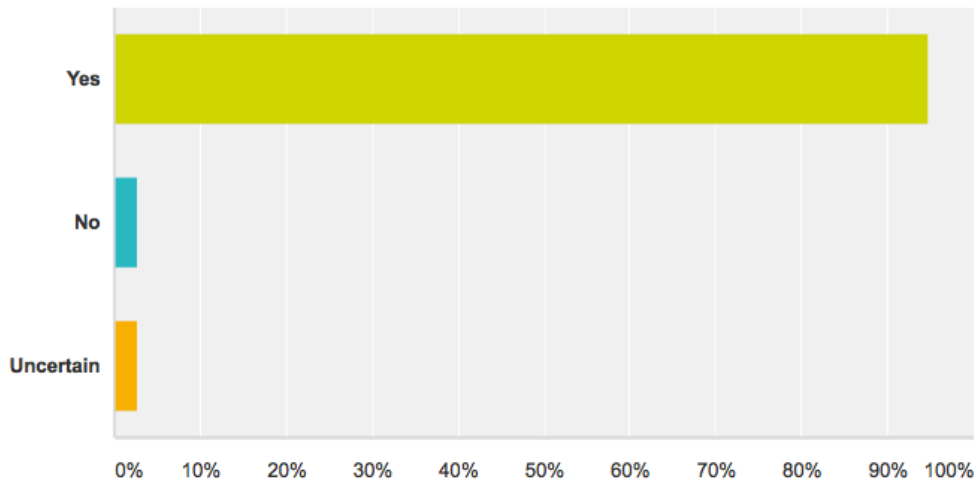


Answer Choices	Responses
Yes	96.50% 331
No	2.62% 9
Uncertain	0.87% 3
Total	343



**As the marketplace after 6 years has not fixed this problem, should the U.S. DOT issue a rule requiring airlines to provide this information to channels where they sell their base fares?**

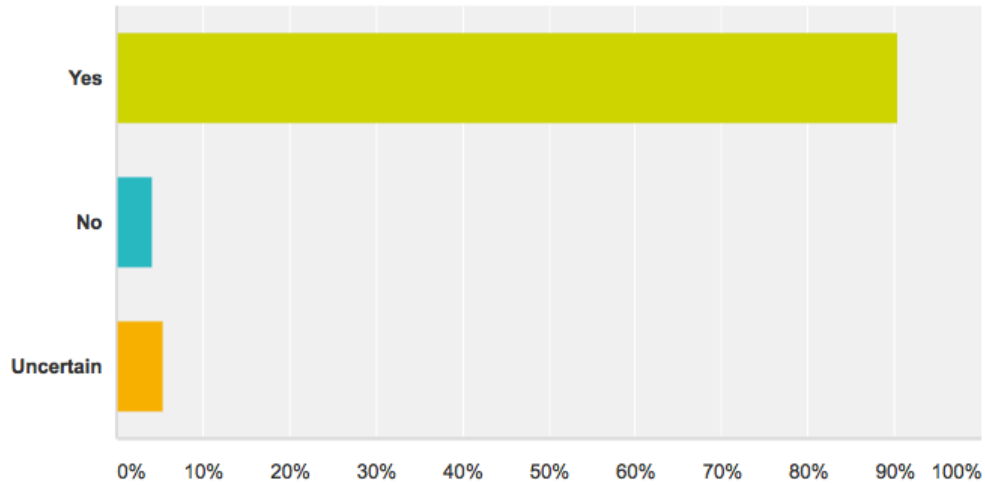
Answered: 343 Skipped: 0



Answer Choices	Responses
Yes	94.75% 325
No	2.62% 9
Uncertain	2.62% 9
Total	343

**If yes, should the U.S. DOT require ancillary fee information to be shared in a format that allows the purchase of such services in the same transaction as the ticket purchase?**

Answered: 336 Skipped: 7



Answer Choices	Responses
Yes	90.48% 304
No	4.17% 14
Uncertain	5.36% 18
Total	336

**SURVEY PARTICIPANTS**

- U.S. General Services Administration (GSA)
- U.S. Federal Aviation Administration (FAA)
- U.S. Marine Corps Headquarters
- The Port Authority of NY & NJ
- State Travel Managers Alliance (STMA)
- Guild of Travel Management Companies (GTMC)
- Finnish Business Travel Association
- Association for Airline Passenger Rights
- Association of Blind Citizens
- Travelers United
- Financial Industry Regulatory Authority (FINRA)
- Institute of Nuclear Power Operations
- David & Lucile Packard Foundation

W.K. Kellogg Foundation  
Catholic Health Association  
American Academy of Ophthalmology  
American Dental Association  
Teachers Insurance and Annuity Association  
SmarterTravel.com  
Ad Hoc Committee  
Mercedes-Benz USA, LLC  
GlaxoSmithKline  
ConocoPhillips  
CIGNA  
Cargill  
Sapient  
Pfizer, Inc.  
Philips NA  
Whirlpool Corporation  
Kellogg  
CAMPBELL SOUP COMPANY  
Gartner  
New York Life Insurance  
The Travelers Companies, Inc.  
AOL  
Cisco Systems  
Dell Software Group  
Wells Fargo  
Gap, Inc.  
Nike, Inc.  
HealthCare California  
Cannon Design  
DOLLAR TREE  
Marsh & McLennan  
MOOG, Inc.  
The Schwan Food Company  
Yale University  
The George Washington University  
University of California, Los Angeles  
Embry-Riddle Aeronautical University  
University of North Carolina Wilmington  
University of Washington  
The University of Texas at Austin  
John Carroll University  
University Of Delaware  
Michigan Technological University  
University of Missouri  
MD Anderson Cancer Center  
Seneca College  
Airlines Reporting Corporation (ARC)

Low-Fare & Regional Airlines  
iJET  
AirPlus International  
Concur Technologies  
InterContinental Hotels Group Plc  
NWA Regional Airport  
Budget Rent a Car  
Cornerstone Information Systems  
Denver International Airport  
Corporate Travel Buyer Resources  
Hickory Global Partners  
Travel and Transport  
BCD Travel  
Maritz Travel Company  
The Travel Company Edinburgh  
World Travel, Inc.  
Balboa Travel, Inc.  
Valerie Wilson Travel, Inc.  
UNIGLOBE Travel  
TravelStore  
Travel Leaders  
The Travel Team, Inc.  
Short's Travel Management  
Omega World Travel  
Ovation Corporate Travel/The Lawyers Travel  
Bio-Rad Laboratories, Inc.  
Dart Container  
Unum  
Turner International LLC  
FC USA, Inc.  
Enable Healthcare  
LDS Church Travel  
HCA Healthcare  
HCC Insurance Holdings, Inc.  
Tech Data Corp  
Scotts Miracle-Gro  
Rockwell Automation  
Purcell Systems, Inc.  
OSI Systems  
National Instruments  
Navistar, Inc.  
CH2M HILL  
NOVA Chemicals  
Novo Nordisk Inc.  
MICROS Systems, Inc.  
Accent Travel Int'l  
Acendas - Travel Management Company

AchieveGlobal  
Advent Travel Leaders  
Aladdin Travel  
ALASKA TRAVEL SOURCE  
Alexander Shreders Consulting  
All Travel  
Almeda Travel  
Anon  
Anthony Travel  
Antietam Travel Service, Inc.  
Atlas Travel  
ATPI - Advanced Travel Partners International  
AutoNation, Inc.  
Avia Marketing Consultants Inc  
Aviation Innovation  
Axcelis Technologies  
Berger Travel Agency Inc  
Blackboard, Inc.  
BMC Software, Inc  
BRW Negócios & Turismo  
Burlington Coat Factory  
BYU Idaho Travel Office  
AVID  
Cadence Design Systems  
CAE, Inc.  
Caraway Travel Inc.  
CHC Helicopter  
CI Travel  
CLG Travel Management  
Colpitts World Travel  
Colwick Travel  
Corbin Ball Associates  
Corniche Travel Group  
Corporate Travel Management  
Covington Travel  
Cresta World Travel  
Crowne Plaza LX  
Discount Travel  
Eaton  
Egencia  
El Sol Travel inc  
Employee Travel Specials  
Enterprise Holdings Inc.  
Eton Travel  
FANUC America Corporation  
Far Horizons Travel, LTD.  
Fives, Inc.

FreemanWhite  
Fresenius Medical Care NA  
Friendly Travel, Inc.  
Gemini Travel  
Geraci Travel  
Get-A-Way Travel  
GKR Consulting, LLC.  
Global, Inc.  
Global Travel  
Global Travel Management  
GlobalPoint Travel Solutions  
GRACY TRAVEL INTERNATIONAL  
Haworth, Inc.  
HMHF Travel Management Corporation  
HNL Travel Associates  
Hologic, Inc.  
HNTB Corporation  
Homewood Suites by Hilton Austin-South/Airport  
Hospitality Technology Consulting  
InterplX Expense Management  
Jack Henry and Associates  
JBS & Associates  
John S Stow Consulting, LLC  
Leggett & Platt, Incorporated  
Lumbermens Merchandising Corp.  
LXR Travel LLC  
MacNair Travel Management / American Express  
Makino, Inc.  
Management Concepts  
Mann Travels  
MDDUS  
MEDITECH  
Metro Travel  
Midwest Travel Consultants  
Mondelez International  
Montrose Travel  
MSP Travel Group  
MTD Products, Inc.  
Océ-Technologies  
Odigeo (Opodo ltd. GoVoyages, eDreams, Travellink  
OKT Travel  
Provisur Technologies, Inc.  
Redfern Travel  
S.R. Travel  
Sabre  
SANDITZ TRAVEL  
Skanska USA Building

Tribune Content Agency  
Spokane Airport Ramada  
Sportscorp Travel  
State Street Corporation  
Stepan Company  
Stoel Rives  
Sullivan & Cromwell LLP  
Summit Travel Group  
Sun Travel, Inc  
Sunflower Travel  
Teplis Travel  
The Expedition Development Company  
The Travel Group  
Transocean  
Travel Concepts  
Travel Inc.  
Travel Landing USA  
Travel Leaders Indianapolis  
Travel Leaders Rice Lake  
Travel Management Partners, Inc.  
Travel One, Inc.  
Travel Pacific  
Travelennium. Inc.  
Traveline  
Travelocity  
Travelport  
Travizon  
Trimble Navigation  
Uniglobe Accent Travel  
Uniglobe Travel  
Universal Travel / Accent Travel  
Up and Away Travel  
Utecht Diversified Event Resource, Inc.  
Valencia Hotels, Inc  
Valero Energy Corporation  
Valley Services, Inc.  
VIATUR TRAVEL SERVICES  
VISA Tours & Travel [P] Ltd  
Wallenius Wilhelmsen Logistics  
Watlow  
Webasto SE  
White Lodging  
Windgrove Ltd t/a Travel Bureau  
Windows of the World Travel Ltd  
WPP

## **Addendum III**

September 29, 2014

The Honorable Anthony Foxx  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

Regarding DOT-OST-2014-0056-0079

Dear Secretary Foxx,

We the undersigned corporate, university and government travel managers, travel management companies and other industry stakeholders write to applaud the U.S. Department of Transportation's (DOT) efforts to put in place airline consumer protections through the current Notice of Proposed Rulemaking (NPRM) concerning the multitude of so-called ancillary services for which airlines now charge separately. As major consumers and sellers of airline services, we are keenly interested in your transparency proposal to require airlines to provide ancillary fee data to ticket agents who are authorized to sell travel services on behalf of an airline. In fact, we think that airlines withholding this vital information on other fees and charges is inherently deceptive -- as it is tantamount to disclosing only a part of the all-in costs the consumer will pay to travel.

However, that core proposal also needs to require that the fee data be provided in a format that allows for the purchase of ancillary services in the same transaction as the base ticket. In the case of airline pricing, true transparency requires ancillary fee transactability because it is the sole enabler of efficient comparison-shopping of the total prices of travel alternatives. Consumers expect not just to be told the price of these add-on fees but to be able to buy them at the time when they commit to the purchase of a ticket so they can lock-in the prices they have been quoted. The rule should include a requirement that fee data provided to ticket agents be transactable.

The NPRM has many new complex DOT proposals. However, after three years of comments, studies and reviews by DOT and the Office of Management and Budget the ancillary-fee record is complete and the record on the other proposals is virtually non-existent. We are concerned that the ancillary-fee rule may well become entangled with a raft of knotty issues arising from the other proposals consequently pushing a decision deep into 2015, or even halting the process indefinitely. As such, we urge DOT to issue a final rule on ancillary fees as soon as possible and address the balance of the proposals at a later time.

We greatly appreciate your advocacy of the individual and organizational consumer of commercial air transportation services.



Sincerely,

Business Travel Coalition  
Hickory Global Partners, LLC  
Air Passengers Association of India  
Spokane International Airport  
Travel and Transport, Inc.  
GlobalPoint Travel Solutions  
World Travel, Inc.  
Rich Products Corporation  
HealthCare California  
TravelStore  
HelmsBriscoe  
Flyers Rights  
Oracle  
VISA Tours & Travel [P] Ltd  
The Travel Insider  
A & I Travel Management, Inc.  
Balboa Travel, Inc.  
AVID  
Joselyn, Tepper & Associates, Inc.  
Colpitts World Travel  
Travel-On, Ltd.  
Travel Shoppe  
Hidden Treasure Tours, Inc.  
Roberta's Travel Solutions  
LXR Travel LLC  
Colwick Travel Corporation  
John S Stow Consulting, LLC  
Anthony Travel  
Stephens, Inc.  
BYU-Idaho  
Teamsters Local 455  
Geraci Travel  
Universal Travel  
Mikail J Khan, Esq.  
Anthony Decorators  
PSEG  
Chateau Publishing  
Gregory Lane Hunter, Attorney  
Susan Smith Travel  
JADA MANAGEMENT SYSTEMS, LLC  
Mircalla Technology  
Tzell Travell Group NW  
CyberEdge Information Services  
On Trek Student Travel

Sandy's Travel Services, Inc.  
FoxWatch Inc.  
Britt's Auto Sale  
Dematic  
Novustep LLC  
Makino, Inc.  
Arrowhead Asset Management  
HBT Enterprises, LLC  
Fenwick High School, Oak Park, IL.  
International Consulting  
Association of Blind Citizens  
ELG Consulting  
Transformation International LLC  
MicroEdge, LLC  
RFC COMPANY  
L. K. Stevens  
Rob Sullivan Productions  
Redfern Travel  
ADA Travel  
HNL Travel Associates  
Options Travel  
Accent Travel  
Accent Travel Austin  
Saraswati Publications, LLC  
OSI Systems, Inc.  
Megatours